

1 **FRONTIER LAW CENTER**

2 Robert L. Starr (183052)
3 robert@frontierlawcenter.com
4 Karo G. Karapetyan (318101)
5 karo@frontierlawcenter.com
6 Manny Starr (319778)
7 manny@frontierlawcenter.com
8 23901 Calabasas Road, Suite 2074
9 Calabasas, California 91302
10 Telephone: (818) 914-3433
11 Facsimile: (818) 914-3433

12 **POMERANTZ LLP**

13 Jordan L. Lurie (130013)
14 jllurie@pomlaw.com
15 Ari Y. Basser (272618)
16 abasser@pomlaw.com
17 1100 Glendon Avenue, 15th Floor
18 Los Angeles, CA 90024
19 Telephone: (310) 432-8492
20 Facsimile: (310) 861-8591

21 Attorneys for Plaintiff Gor Gevorkyan

22 **UNITED STATES DISTRICT COURT**
23 **NORTHERN DISTRICT OF CALIFORNIA**

24 Gor Gevorkyan on behalf of himself and all
25 others similarly situated,

26 Plaintiff,

27 vs.

28 Bitmain, Inc., Bitmain Technologies, Ltd.
and DOES 1 to 10,

Defendants.

Case Number: 3:18-cv-07004-JD

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME TO CONDUCT
JURISDICTIONAL DISCOVERY AND
CONTINUING JURISDICTIONAL
BRIEFING SCHEDULE**

Complaint Filed: November 19, 2018
Trial Date: None Set

1 Plaintiff Gor Gevorkian (“Plaintiff”) and Defendant Bitmain Technologies, Ltd.
2 (“Bitmain”) (together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:
3

4 **WHEREAS**, on December 19, 2019, the Court granted leave for Plaintiff to conduct
jurisdictional discovery on Defendant for a period of 120 days (ECF No. 44);
5

6 **WHEREAS**, due to travel restrictions related to the COVID-19 pandemic, the Parties
7 stipulated to allow Plaintiff until July 22, 2021, to take a deposition of a Bitmain witness who is
8 knowledgeable regarding the facts set forth in the Declarations of Luyao Liu (ECF No. 72); and
9 the Court approved the Parties’ Stipulation (ECF No. 73);
10

11 **WHEREAS**, the Court granted a stipulated extension of Plaintiff’s deadline to depose a
12 Bitmain witness until August 27, 2021 (ECF No. 76), so that the witness could obtain necessary
13 government authorizations that would allow him to travel to South Korea and sit for deposition
14 at the offices of O’Melveny & Myers LLP in Seoul, South Korea;
15

16 **WHEREAS**, the Court also ordered that Plaintiff could seek additional leave to further
17 extend the deadline to conduct the deposition in the event that he was unable to take the
18 deposition by August 27, 2021, because of circumstances beyond his control (ECF No. 76);
19

20 **WHEREAS**, Bitmain has been diligent in applying for the necessary visa and approvals
21 from the relevant authorities of the Republic of Korea;
22

23 **WHEREAS**, the Bitmain witness was recently issued a visa to travel to South Korea
24 and is in the process of applying for a quarantine exemption from the authorities of the
25 Republic of Korea;
26

27 **WHEREAS**, the delay in obtaining all necessary government approvals, which was
28 beyond the Parties’ control, has made it infeasible to conduct the deposition before August 27,
2021;
29

30 **WHEREAS**, a further brief extension of the time to take the deposition will allow time
31 for final government approvals to be issued;
32

33 **WHEREAS**, the parties have agreed to reschedule the deposition to take place on
34 September 2, 2021, subject to obtaining final approvals from the relevant authorities;
35

1 **THEREFORE, THE PARTIES HAVE MET AND CONFERRED AND AGREED**
2 **THAT:**

3 1. The time for Plaintiff to depose a Bitmain witness should be extended by fourteen
4 (14) days until September 10, 2021, in anticipation of the parties being able to
5 conduct the deposition in Seoul, Republic of Korea, subject to the approval of the
6 relevant authorities;

7 2. The deadline to file simultaneous briefs addressing the issue of specific jurisdiction
8 over the Defendant shall be 30 days after the date that Plaintiff takes the
9 aforementioned deposition.

10 **NOW, THEREFORE**, the undersigned Parties hereby stipulate and agree, subject to
11 Court approval, that:

12 1. The time for Plaintiff to depose a Bitmain witness should be extended by fourteen
13 (14) days until September 10, 2021, in anticipation of the parties being able to
14 conduct the deposition in Seoul, Republic of Korea, subject to the approval of the
15 relevant authorities;

16 2. If the Parties are unable to schedule a mutually convenient time and place to take the
17 deposition by that date, Plaintiff may seek additional leave of Court to further extend
18 the deadline to conduct the deposition;

19 3. The Parties shall file simultaneous briefs addressing the issue of specific jurisdiction
20 over the Defendant within 30 days after the date that Plaintiff takes the
21 aforementioned deposition(s).

22 **IT IS SO STIPULATED**

23 Dated: August 16, 2021

24 /s/ Karo G. Karapetyan
25 Robert Starr (183052)
26 Karo G. Karapetyan (318101)
27 Manny Starr (319778)
28 FRONTIER LAW CENTER
23901 Calabasas Rd, Suite 2074

Calabasas, CA 91302
Telephone: (818) 914-3433
Facsimile: (818) 914-3433
E-Mail: robert@frontierlawcenter.com
karo@frontierlawcenter.com
manny@frontierlawcenter.com

Jordan L. Lurie (130013)
Ari Y. Basser (272618)
POMERANTZ LLP
1100 Glendon Avenue, 15th Floor
Los Angeles, CA 90024
Telephone: 310-405-7190
Facsimile: 917-463-1044
E-mail: jllurie@pomlaw.com
abasser@pomlaw.com

Christopher Marlborough (298219)
THE MARLBOROUGH LAW FIRM, P.C.
445 Broad Hollow Road, Suite 400
Melville, NY 11747
Telephone: (212) 991-8960
Facsimile: (212) 991-8952
E-Mail: chris@marlboroughlawfirm.com

Attorneys for Plaintiff

Dated: August 16, 2021

/s/ Carlos M. Lazatin
Carlos M. Lazatin
William K. Pao
Jason A. Orr
O'MELVENY & MYERS LLP
400 South Hope Street
18th Floor
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
Email: clazatin@omm.com
Email: wpao@omm.com
Email: jorr@omm.com

Attorneys for Defendant
Bitmain Technologies, Ltd.

ECF CERTIFICATION

Pursuant to Civil Local Rule 5-1, I, Karo G. Karapetyan, hereby attest that concurrence in the filing of this document has been obtained from all signatories.

DATED: August 16, 2021

FRONTIER LAW CENTER

By: /s/ Karo G. Karapetyan
Karo G. Karapetyan

[PROPOSED] ORDER

The Court, having considered the Joint Stipulation submitted by the Parties, and good cause appearing, orders as follows:

1. The time for Plaintiff to depose a Bitmain witness shall be extended by fourteen (14) days until September 10, 2021, in anticipation of the parties being able to conduct the deposition in Seoul, Republic of Korea, subject to the approval of the relevant authorities;
2. If the Parties are unable to schedule a mutually convenient time and place to take the deposition by that date, Plaintiff may seek additional leave of Court to further extend the deadline to conduct the deposition;
3. The Parties shall file simultaneous briefs addressing the issue of specific jurisdiction over the Defendant within 30 days after the date that Plaintiff takes the aforementioned deposition(s).

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

Hon. James Donato
UNITED STATES DISTRICT JUDGE